

EXHIBIT 2

DECLARATION OF MARK HETFIELD

I, Mark Hetfield, hereby declare:

1. I am the President of HIAS, Inc., one of ten national refugee resettlement agencies. The facts set forth in this declaration are based on my personal knowledge, my conversations with my staff, and the information kept in the ordinary course of business at HIAS.

2. I make this declaration to set forth the impact on HIAS of the State Department's actions since February 25, 2025, when the Court heard argument in our motion for a preliminary injunction and issued a verbal order finding unlawful the State Department's actions to suspend the U.S. Refugee Admissions Program (USRAP).

I. Termination of HIAS' Cooperative Agreements on February 26, 2025

3. HIAS receives funding from the U.S. Department of State through thirteen "cooperative agreements" with the Bureau of Population, Resettlement and Migration (PRM) (the "cooperative agreements" or "grants"). Four of these cooperative agreements, which have end dates in September 2025, fund HIAS' work agreements for the USRAP program. These four cooperative agreements provide HIAS with \$36,943,648 in revenue.

4. As I described in my previous declaration (ECF 15-24 ¶¶ 19-24), these four cooperative agreements provide for HIAS to operate the following programs:

- (i) Administration of Resettlement Support Center (RSC) in Austria, with suboffices in Croatia and Israel;
- (ii) Administration of the Equitable Resource and Action Consortium (ERAC), which identifies vulnerable people in need of resettlement and facilitates their application to USRAP;
- (iii) Provision of Reception and Placement (R&P) services to refugees and Special

Immigrant Visa holders (SIVs) who are not Afghan under a funding stream called Migration and Refugee Assistance (MRA); and

- (iv) Provision of R&P services specifically to Afghan refugees and SIVs under a funding stream called Emergency Refugee and Migration Assistance (ERMA).

5. As described in my previous declaration, refugee admissions and decision-making were suspended on January 20, 2025, and all the funds PRM committed to HIAS under these four cooperative agreements were halted through Notices of Suspension and “stop-work orders” that HIAS received from PRM on January 24, 2025. (ECF 15-24 ¶¶ 44-45).

6. On the afternoon and evening of Wednesday, February 26, 2025, HIAS began receiving a series of email communications stating that PRM was terminating these same four cooperative agreements for USRAP work.

7. For each cooperative agreement, HIAS received a Notice of Termination with the words “NOTICE OF TERMINATION” in all capital letters near the top of the document.

8. The Notices of Termination for all four cooperative agreements and the accompanying emails are annexed to this declaration as Attachment A.

9. The Notices of Termination purport to be effective immediately, and the only reason provided for termination is that the awards “no longer effectuate[] agency priorities.” *Id.*

II. Devastating and Compounding Impacts of Funding Suspension and Termination

10. PRM’s actions to terminate our cooperative agreements under USRAP compound the devastating impact of the Notices of Suspension that we received on January 24, 2025.

11. First, we have received no funding for any work we expected to do from January 24, 2025 to date. Second, we have yet to receive full reimbursements for work done under these cooperative agreements for work done prior to January 24, 2025. On February 27, 2025, we

received \$2,967,046.07 in reimbursements for work done prior to January 24, 2025, but as noted in my previous declaration, we are owed \$346,698.70 on our USRAP grants for work done prior to issuance of the stop-work order. (ECF 15-24 ¶ 59).

12. The impact on our operations has been severe. From February 24, 2025 to date, we have laid off more than 200 people: 123 in our international offices and 83 in our U.S. headquarters. We have furloughed an additional 14 in our U.S. offices. This is in addition to a first round of layoffs following the initial Stop Work orders. We expect to lay off many more if these Termination Notices are allowed to stand.

13. The Terminations also create enormous, and perhaps insurmountable, obstacles to refugees approved or in process for approval for admission to the U.S. With no ability to continue our work under the USRAP, we will not be able to assist refugees and SIV holders in our pipeline to proceed with applications, enter the United States once approved and travel-ready, and obtain crucial resettlement services once here.

14. As described in my previous declaration, (ECF No. 15-24 ¶¶ 47-49), as of February 6, 2025, through its Reception and Placement, Virtual Reception and Placement and Welcome Corps programs, HIAS has 3,512 clients overseas, including Follow-to-Join family members of refugees in the United States and SIVs from Iraq and Afghanistan, who have been extensively vetted and are awaiting resettlement to the United States; at least 1,425 of these were “travel-ready” and just awaiting boarding documents and flight plans to enter the United States.

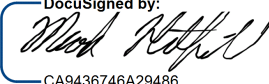
III. Conclusion

15. Without immediate relief to stop the Termination Notices, HIAS and its clients will suffer immeasurable harm. The Court’s order enjoining the ban on refugee admission will be extraordinarily difficult to enforce without the work of HIAS and its fellow resettlement

agencies, and the refugees we work with will be further and indefinitely delayed from entering the United States. HIAS itself will be forced to lay off many more staff and curtail operations indefinitely. Restoring our decades-old structures and relationships will be near-impossible if these Terminations stand.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on March 5, 2025

DocuSigned by:

CA9436746A29486...
Mark Hetfield

Attachment A

(to Mark Hetfield Declaration)

From: A/OPE/FA Grants Policy <aopetagrantspolicy@state.gov>

Sent: Wednesday, February 26, 2025 4:17 PM

To: [REDACTED]@hias.org> Subject:

Termination Notice [SPRMC024CA0348]

EXTERNAL EMAIL

Dear Partner,

Your award SPRMC024CA0348 is being terminated for the convenience of the U.S. Government pursuant to a directive from U.S. Secretary of State Marco Rubio, for alignment with Agency priorities and national interest. The decision to terminate this individual award is a policy determination vested in the Secretary of State.

Detailed instructions will follow, and a formal modification/amendment to memorialize this action is forthcoming from the Grants Office for specific awards. Kindly confirm receipt of this Termination Notice via electronic email response to the sender.

Thank you for your partnering with the Department of State and God Bless America.



Termination_Notice_SPRMCO24CA0348.pdf

121K
121K



Department of State

Termination Notification

NOTICE OF TERMINATION

February 26, 2025

HIAS Inc.

[REDACTED]
1300 Spring Street Suite 500
Silver Spring, MD 201910-3634

REF: SPRMCO22CA0311 Equitable Resettlement Access

Dear [REDACTED]:

The U.S. Department of State hereby notifies the recipient that this award is immediately terminated as of February 26, 2025. This award no longer effectuates agency priorities and is terminated in accordance with the U.S. Department of State Standard Terms and Conditions, 2 CFR 200.340, and/or Award Provisions as applicable.

Effective immediately upon receipt of this Notice of Termination, the Recipient must stop all work on the program and not incur any new costs after the effective date cited above. Payment requests for legitimate costs incurred prior to this notification are allowable. If your award is already in suspended status, payment requests for legitimate costs incurred prior to the effective date of the Notice of Suspension are allowable. The Recipient must cancel as many outstanding obligations as possible.

Final reports will be due in accordance with the Award Provisions.

Sincerely,

PHILIP M
DENINO

Digitally signed by
PHILIP M DENINO
Date: 2025.02.26
18:11:01 -05'00'



February 26, 2025

To: HIAS INC

Email: [REDACTED]@hias.org

Subject: Termination Notification of Award No. SPRMCO24CA0348

Reference: state.gov/federal-assistance-policies-appeals/

Dear Partner,

This award is being terminated for the convenience of the U.S. Government pursuant to a directive from U.S. Secretary of State Marco Rubio, for alignment with Agency priorities and national interest. The decision to terminate this individual award is a policy determination vested in the Secretary of State.

Detailed instructions will follow, and a formal modification/amendment to memorialize this action is forthcoming from the Grants Office for specific awards. Kindly confirm receipt of this Termination Notice via electronic email response to the sender.

Sincerely,

Sharon D. James

Sharon D. James
Managing Director
Acquisition Policy Directorate (A/GA/APD)
Department of State



Department of State

Termination Notification

NOTICE OF TERMINATION

February 26, 2025

HIAS Inc.

[REDACTED]
1300 Spring Street Suite 500
Silver Spring, MD 201910-3634

REF: SPRMCO24CA0348 Worldwide R&P

Dear [REDACTED]:

The U.S. Department of State hereby notifies the recipient that this award is immediately terminated as of February 26, 2025. This award no longer effectuates agency priorities and is terminated in accordance with the U.S. Department of State Standard Terms and Conditions, 2 CFR 200.340, and/or Award Provisions as applicable.

Effective immediately upon receipt of this Notice of Termination, the Recipient must stop all work on the program and not incur any new costs after the effective date cited above. Payment requests for legitimate costs incurred prior to this notification are allowable. If your award is already in suspended status, payment requests for legitimate costs incurred prior to the effective date of the Notice of Suspension are allowable. The Recipient must cancel as many outstanding obligations as possible.

Final reports will be due in accordance with the Award Provisions.

Sincerely,

PHILIP M
DENINO

Digitally signed by
PHILIP M DENINO
Date: 2025.02.26
19:35:16 -05'00'



Department of State

Termination Notification

NOTICE OF TERMINATION

February 26, 2025

HIAS Inc.

[REDACTED]
1300 Spring Street Suite 500
Silver Spring, MD 201910-3634

REF: SPRMCO24CA0349 Afghanistan R&P ERMA

Dear [REDACTED]:

The U.S. Department of State hereby notifies the recipient that this award is immediately terminated as of February 26, 2025. This award no longer effectuates agency priorities and is terminated in accordance with the U.S. Department of State Standard Terms and Conditions, 2 CFR 200.340, and/or Award Provisions as applicable.

Effective immediately upon receipt of this Notice of Termination, the Recipient must stop all work on the program and not incur any new costs after the effective date cited above. Payment requests for legitimate costs incurred prior to this notification are allowable. If your award is already in suspended status, payment requests for legitimate costs incurred prior to the effective date of the Notice of Suspension are allowable. The Recipient must cancel as many outstanding obligations as possible.

Final reports will be due in accordance with the Award Provisions.

Sincerely,

PHILIP M
DENINO

Digitally signed by
PHILIP M DENINO
Date: 2025.02.26
19:44:18 -05'00'



Department of State

Termination Notification

NOTICE OF TERMINATION

February 26, 2025

HIAS Inc.

[REDACTED]
1300 Spring Street Suite 500
Silver Spring, MD 201910-3634

REF: SPRMCO24CA0354 RSC Austria FY25

Dear [REDACTED]:

The U.S. Department of State hereby notifies the recipient that this award is immediately terminated as of February 26, 2025. This award no longer effectuates agency priorities and is terminated in accordance with the U.S. Department of State Standard Terms and Conditions, 2 CFR 200.340, and/or Award Provisions as applicable.

Effective immediately upon receipt of this Notice of Termination, the Recipient must stop all work on the program and not incur any new costs after the effective date cited above. Payment requests for legitimate costs incurred prior to this notification are allowable. If your award is already in suspended status, payment requests for legitimate costs incurred prior to the effective date of the Notice of Suspension are allowable. The Recipient must cancel as many outstanding obligations as possible.

Final reports will be due in accordance with the Award Provisions.

Sincerely,
